

PATENT

Docket No. RSW920010005US1

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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APPLICATION NO.	09/864,547	Confirmation No. 4085
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CASE NO.	RSW920010005US1	Group Art Unit: 2174
TITLE: MULTIPLE LOCALE BASED DISPLAY AREAS		

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Commissioner for Patents
MAIL STOP APPEAL BRIEF-PATENTS
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Attention: Board of Patent Appeals and Interferences

APPELLANTS' BRIEF

This brief is being filed in response to the Notification of Non-Compliant Appeal Brief, mailed by the Patent Office on September 27, 2006. It is a resubmission of the Appeal Brief originally filed electronically on September 18, 2006. **The Appeal Brief filing fee was already charged to Applicant's Deposit Account when the original Brief was filed on September 18, 2006.**

This brief is in furtherance of the Notice of Appeal filed in this case on July 18, 2006. The Commissioner is authorized to charge any additional required fees for filing of this Appeal Brief to Deposit Account No. 09-0461.

1. REAL PARTY IN INTEREST

The present application is assigned to International Business Machines Corporation, having its principal place of business at New Orchard Road, Armonk, New York 10504. Accordingly, International Business Machines Corporation is the real party in interest.

2. RELATED APPEALS AND INTERFERENCES

The appellant, assignee, and the legal representatives of both are unaware of any other appeal or interference which will directly affect or be directly affected by or have a bearing on the Board's decision in this appeal.

3. STATUS OF CLAIMS

- A. Claims canceled: None
- B. Claims withdrawn from consideration but not canceled: None
- C. Claims pending: 1-32
- D. Claims allowed: none
- E. Claims rejected: 1-32
- F. Claims appealed: 1-32

Appealed claims 1-32 as currently pending are attached as the Claims Appendix hereto.

4. STATUS OF AMENDMENTS

A Reply under 37 C.F.R. §1.111 was filed on June 14, 2004; no claim amendments were made. In response, the Examiner issued a final Office Action on October 6, 2004. A Reply under 37 C.F.R. §1.116 was filed on December 6, 2004, and no claim amendments were made. Applicants filed a Notice of Appeal on April 7, 2005, along with a Petition to Revive, The Petition to Revive was granted. Applicants then filed an Appeal Brief on August 30, 2005. The Examiner then issued a non-final Office Action on November 16, 2005. A Reply under 37 C.F.R.

§1.112 was filed on February 16, 2006. In response, the Examiner issued the final Office Action appealed herein.

Applicant filed a Notice of Appeal on July 18, 2006.

5. SUMMARY OF THE CLAIMED SUBJECT MATTER

Claim 1: A method for displaying information in a display area comprising the steps of: associating a first set of information with a first locale designation (*page 5, lines 11-18*); associating a second set of information with a second locale designation (*page 5, line 19-page 6, line 4*); displaying data from said first set of information in accordance with properties of said first locale designation (*page 7, lines 1-6*); and displaying data from said second set of information in accordance with properties of said second locale designation, said data from said first and second set of information displayed simultaneously on the display area (*page 7, lines 1-17*).

Claim 13: A graphical user interface (GUI) comprising: a first display area for displaying data from a first set of information in accordance with properties of a first locale designation (*page 8, line 15-page 9, line 12*); and a second display area for displaying data from a second set of information in accordance with properties of a second locale designation (*page 9, line 13-page 10, line 3*).

Claim 23: A graphical user interface (GUI) comprising: a plurality of display areas; a first of said display areas for displaying source information associated with a source locale designation; one or more of said display areas for displaying target information, each of said one or more of said display areas for displaying target information corresponding to one of one or more target locale designations; and

other display areas not associated with said source locale designation or said one or more target locale designations associated with a system locale designation (*page 8, line 15-page 10, line 12*).

Claim 25: A system for displaying information associated with multiple locales, said system comprising: means for associating a first set of information with a first locale designation and a second set of information with a second locale designation; and means for displaying said first and second set of information (*page 7, line 18-page 15, line 13; this is a means-plus-function claim and the structures, materials or acts corresponding to the claimed function are set forth in the text identified*).

Claim 29: A computer program product for displaying information associated with multiple locales, said computer program product comprising: computer readable program code embodied in a computer readable medium, the computer readable program code comprising at least: computer readable program code for associating a first set of information with a first locale designation and a second set of information with a second locale designation; and computer readable program code for displaying said first set of information associated with said first locale designation and said second set of information associated with said second locale designation (*page 7, line 18-page 15, line 13; this is a means-plus-function claim and the structures, materials or acts corresponding to the claimed function are set forth in the text identified*).

This invention deals with problems associated with the display of information in multiple languages in a computer system, and in particular, such display in a Graphical User Interface. Although not limited to such an application, the present invention finds

particular utility in translation programs where it is commonplace for multiple-language displays to be rendered for the user. In prior art systems, the display of the multiple-language information is limited to a display based on the selection of a single locale, typically the locale in which the program is being used. For example, if a translation program for translating Spanish to French is used in the United States (a predominately English-speaking locale), then if the computer on which the translation program resides is set for use in a locale identified as the United States, U.S. protocols for such things as alphabetization are based on English language protocols and English language characters. As an example, the Spanish language contains the character "á." According to a USA locale designation this would be treated as a special character which would come somewhere after "z" in an alphabetically sorted order. In a Spanish locale designation sorted order, however, "á" would be located between "a" and "b." Accordingly, Spanish words which begin with "á" would not be located where an operator would expect to find them if sorted according to a USA locale designation.

The present invention overcomes this problem by allowing multiple locales to be selected for information being displayed in a single display area (e.g., a GUI), with information associated with a first locale being displayable in accordance with properties of the first locale while information associated with a second locale being simultaneously displayable in accordance with properties of the second locale.

6. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Applicant requests the Board to review the following rejections:

1. Rejection of claims 13-22 under 35 U.S.C. §102(e) based on U.S.

Patent Application Publication No. 2001/0051959 to Penn et al.;

2. Claims 1-12 and 23-32 under 35 U.S.C. §103(a) based on 1-12 under 35 U.S.C. §103(a) based on U.S. Patent Application Publication No. 2001/0051959 to Penn et al. in view of U.S. Patent No. 6,141,007 to Lebling et al.

7. ARGUMENT

The present invention provides a method and GUI for displaying information in a display area by associating each of a plurality of sets of information with a locale designation and displaying the information in accordance with properties of the associated locale designations. In a preferred embodiment, the present invention further includes the step of sorting the plurality of sets of information in accordance with properties of the associated locale designations.

Of importance to the present invention is the definition of the term "locale designations". As described on page 1 of the present application, "the locale designation represents a particular geographic area and has associated properties which define how the information should be displayed and sorted. The locale designation will generally be associated with a character set which contains all of the characters for the language of the designated locale." (*Page 1, line 14 through page 2, line 1.*). This definition corresponds to the definition of the term "locale" as defined in Java programming. See, for example, the Java definition of "locale" as found at <http://java.sun.com/j2se/1.4.2/docs/api/java/util/Locale.html>. As set forth at the above-described URL, the Java definition of "locale" is as follows:

"A locale object represents a specific geographical, political or cultural region. An operation that requires a locale to perform its task is called locale-sensitive and uses the locale to tailor information for the user. For example, displaying a number is a locale-sensitive

operation--the number should be formatted according to the customs/conventions of the user's native country, region, or culture."

U.S. Patent Application Publication No. 2001/0051959 to Penn et al.

U.S. Patent Application Publication No. 2001/0051959 to Penn et al. ("Penn") teaches a method and system for navigating the World Wide Web for information concerning a location. Essentially, Penn is a global information resource which provides news, information, and access to products and services relating to and from various nations, which can be accessed from an initial webpage that identifies multiple continents and allows selection of certain nations within each continent from the initial page. Thus, a user may select the continent Asia, and then within Asia, select a nation located in Asia, and then receive and display a variety of information about that nation as set forth, for example, in paragraph 0014 of Penn.

U.S. Patent No. 6,141,007 to Lebling et al.

U.S. Patent No. 6,141,007 to Lebling et al. ("Lebling") teaches a newsroom computer graphical user interface and method for displaying a workspace including non-overlapping, cooperating panels. The Examiner relies on Lebling for its teaching of the ability to display multiple workspaces simultaneously.

The Cited Prior Art Does Not Anticipate the Claimed Invention

The MPEP and case law provide the following definition of anticipation for the purposes of 35 U.S.C. §102:

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP §2131 citing *Verdegaal Bros. v. Union Oil*

Company of California, 814 F.2d 628, 631, 2 U.S.P.Q. 2d 1051, 1053
(Fed. Cir. 1987)

The Examiner Has Not Established a *prima facie* Case of Anticipation

As noted above, the present claimed invention is concerned with the ability to set multiple **locale designations**, i.e., the properties associated with a particular geographic area which define how information is displayed and sorted, that is, the Java definition of "locale". By being able to set multiple locales for display within a GUI, the display characteristics associated with more than one locale can be used to display different information sets. Each of the independent claims herein recite multiple display areas in a GUI which allow the display of data using multiple locale designations (e.g., Claim 1: "A method for displaying information in a display area comprising the steps of: associating a first set of information with a **first locale designation**; associating a second set of information with a **second locale designation**; displaying data from said first set of information in accordance with properties of **said first locale designation**; and displaying data from said second set of information in accordance with properties of **said second locale designation**, said data from said first and second set of information displayed simultaneously on the display area."; Claim 13: "a first display area for displaying data from a first set of information in accordance with properties of a first locale designation; and a second display area for displaying data from a second set of information in accordance with properties of a second locale designation.").

Penn contains no teaching or suggestion of the display of information within a GUI according to properties of a first locale and according to properties of a second locale. Penn displays all of the information that it displays using the properties of a single locale, that is, an English-language locale. Applicant admits that Penn does display information about different parts of the world within a single GUI screen. However, the locale designation of Penn is always an English-language locale, i.e., there is no discussion in Penn about designating, for example, the North American continent nations to be displayed using an English-language locale while the Asian continent and its associated nations are designated to be displayed using a different locale designation or setting. Penn simply provides a one-stop location for a user of a computer set for a single locale designation, e.g., English-speaking countries, to find information about locations around the world. By way of contrast, the claimed invention specifies that the GUI comprises a first display area for displaying data from a first set of information in accordance with properties of a first locale designation, and a second display area for displaying data from a second set of information in accordance with properties of a second locale designation (claim 13). Nothing in Penn teaches or suggests this feature. Claim 1, similarly, contains similar claim language in method format:

“A method for displaying information in a display area comprising the steps of:
 associating a first set of information with a first locale designation;
 associating a second set of information with a second locale designation;
 displaying data from said first set of information in accordance with properties of said first locale designation; and
 displaying data from said second set of information in accordance with properties of said second locale designation, said data from said first

and second set of information displayed simultaneously on the display area.”

Applicant notes that the Examiner ignores the claim term “designation” when analyzing the teachings of Penn (see page 9 of the present Final Office Action. The Examiner asserts that Penn’s teaching of the display of “national flag, native language, facts and map of that particular location” is locale information and thus teaches the claimed invention. Applicant does not deny that these things may comprise information about a locale; however, they are not locale designations as is claimed, and they are not locales in the JAVA sense, to which the claims of the present invention are limited.

The Examiner has not Established a *prima facie* Case of Obviousness

As set forth in the MPEP:

To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skilled in the art, to modify the reference or to combine reference teachings.

MPEP 2143

The addition of Lebling does not render the claimed invention obvious. Applicant admits that Lebling shows the display of multiple workspaces simultaneously. However, like Penn, nothing in Lebling teaches or suggests the associating of different sets of information within a GUI window with different locale designations as is claimed in the present invention. Without such teaching or suggestion, there is no motivation to

combine Penn and Lebling to reach the claimed invention. Rather, the combination proposed by the Examiner would simply result in the display of multiple country information as in Penn, using multiple windows, each with the same locale designation as defined in the present application (e.g., as defined by the Java standard).

The locale designation includes meta-information such as the character set for display, the sort order associated with that character set, the search order, the time display order, and other such properties associated with the language of the display. Many different languages can be displayed using the same locale setting, as is done in the prior art. However, by limiting the display to a single locale, subtle differences associated with the manner in which certain characters are displayed, sorted, etc. (such as the Spanish "á" character discussed above) will limit the ability of users of the system to make the best use of the displayed text.

With the present invention, text in one language can be displayed and sorted in one manner (based on the properties of a first locale) and text in another language can be displayed and sorted in a different manner (based on the properties of a second locale). This cannot be accomplished by the cited prior art, and nothing in the cited prior art teaches or suggests this claimed feature.

Each of the independent claims, and all claims depending therefrom, patentably define over Penn, either alone or in combination with Lebling, and are in condition for allowance.

8. CONCLUSION

For the foregoing reasons applicants respectfully request this Board to overrule the Examiner's rejections and allow claims 1-32.

Respectfully submitted:

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Date

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CLAIMS APPENDIX

CLAIMS INVOLVED IN THIS APPEAL:

1. (Original) A method for displaying information in a display area comprising the steps of:

associating a first set of information with a first locale designation;

associating a second set of information with a second locale designation;

displaying data from said first set of information in accordance with properties of said first locale designation; and

displaying data from said second set of information in accordance with properties of said second locale designation, said data from said first and second set of information displayed simultaneously on the display area.

2. (Original) The method of claim 1, further comprising the steps of:

sorting said first set of information in accordance with properties of said first locale designation; and

sorting said second set of information in accordance with properties of said second locale designation.

3. (Original) The method of claim 2, wherein said first set of information is searchable in accordance with properties of said first locale designation and said

second set of information is searchable in accordance with properties of said second locale designation.

4. (Original) The method of claim 1, wherein said step of displaying data from said first set of information comprises displaying data from said first set of information in a character set associated with said first locale designation; and said step of displaying data from said second set of information comprises displaying data from said second set of information in a character set associated with said second locale designation.

5. (Original) The method of claim 1, wherein said first locale designation and said second locale designation are different.

6. (Original) The method of claim 2, wherein said first locale designation is a system locale designation.

7. (Original) The method of claim 1, further comprising the step of:
displaying data from a third set of information associated with a third locale designation, said data from said third set of information displayed simultaneously with said first and second set of data on the display area.

8. (Original) The method of claim 7, further comprising the steps of:

 sorting said first set of information in accordance with properties of said first locale designation;

 sorting said second set of information in accordance with properties of said second locale designation; and

 sorting said third set of information in accordance with properties of said third locale designation.

9. (Original) The method of claim 8, wherein said first set of information is searchable in accordance with properties of said first locale designation, said second set of information is searchable in accordance with properties of said second locale designation, and said third set of information is searchable in accordance with properties of said third locale designation.

10. (Original) The method of claim 7, wherein said step of displaying data from said first set of information comprises displaying data from said first set of information in a character set associated with said first locale designation; said step of displaying data from said second set of information comprises displaying data from said second set of information in a character set associated with said second locale designation; and said step of displaying data from said third set of information comprises displaying data from said third set of information in a character set associated with said third locale designation.

11. (Original) The method of claim 8, wherein said first locale designation is a system locale designation.

12. (Original) The method of claim 7, wherein said first, second, and third locale designations are different.

13. (Original) A graphical user interface (GUI) comprising:
a first display area for displaying data from a first set of information in accordance with properties of a first locale designation; and
a second display area for displaying data from a second set of information in accordance with properties of a second locale designation.

14. (Original) The GUI of claim 13, wherein said first and second locale designations are different.

15. (Original) The GUI of claim 14, wherein said first locale designation is a system locale designation.

16. (Original) The GUI of claim 13, wherein the data from said first set of information displayed in said first display area is sorted in accordance with properties of said first locale designation and the data from said second set of information displayed

in said second display area is sorted according in accordance with properties of said second locale designation.

17. (Original) The GUI of claim 13, further comprising:
a third display area for displaying data from a third set of information, said third set of information associated with a third locale designation.

18. (Original) The GUI of claim 17, wherein said first, second, and third locale designations are different.

19. (Original) The GUI of claim 17, wherein said first locale designation is a system locale designation, said second locale designation is a source locale designation, and said third locale designation is a target locale designation.

20. (Original) The GUI of claim 17, wherein said system locale designation, said source locale designation, and said target form part of a translation system interface.

21. (Original) The GUI of claim 17, wherein said first locale designation is associated with at least a first character set, said second locale designation is associated with at least a second character set, and said third locale designation is associated with at least a third character set.

22. (Original) The GUI of claim 17, wherein the data from said first set of information displayed in said first display area is sorted in accordance with properties of said first locale designation, the data from said second set of information displayed in said second display area is sorted in accordance with properties of said second locale designation, and the data from said third set of information displayed in said third display area is sorted in accordance with properties of said third locale designation.

23. (Original) A graphical user interface (GUI) comprising:

a plurality of display areas;

a first of said display areas for displaying source information associated with a source locale designation;

one or more of said display areas for displaying target information, each of said one or more of said display areas for displaying target information corresponding to one of one or more target locale designations; and

other display areas not associated with said source locale designation or said one or more target locale designations associated with a system locale designation.

24. (Original) The GUI of claim 23, wherein:

said first of said display areas can be sorted and searched in accordance with properties of said source locale designation;

said one or more of said display areas can be sorted and searched in accordance with properties of corresponding ones of said one or more target locale designations; and

said other display areas can be sorted and searched in accordance with properties of said system locale designation.

25. (Original) A system for displaying information associated with multiple locales, said system comprising:

means for associating a first set of information with a first locale designation and a second set of information with a second locale designation; and

means for displaying said first and second set of information.

26. (Original) The system of claim 25, further comprising:

means for sorting said first set of information in accordance with properties of said first locale designation and sorting said second set of information in accordance with properties of said second locale designation; and

means for searching said first and second sets of information.

27. (Original) The system of claim 25, further comprising:
means for associating a third set of information with a third locale designation;
and
means for displaying said third set of information, said third set of information
being displayed simultaneously with said first and second set of information.

28. (Original) The system of claim 27, further comprising:
means for sorting said third set of information in accordance with properties of
said third locale designation; and
means for searching said third set of information.

29. (Original) A computer program product for displaying information associated
with multiple locales, said computer program product comprising:
computer readable program code embodied in a computer readable medium, the
computer readable program code comprising at least:
computer readable program code for associating a first set of information with a
first locale designation and a second set of information with a second locale
designation; and
computer readable program code for displaying said first set of information
associated with said first locale designation and said second set of information
associated with said second locale designation.

30. (Original) The computer program product of claim 29, further comprising:
computer readable program code for sorting said first set of information in
accordance with properties of said first locale designation and sorting said second set
of information in accordance with properties of said second locale designation; and
computer readable program code for searching said first and second sets of
information.

31. (Original) The computer program product of claim 29 wherein said computer
readable program code embodied in a computer readable medium further comprises:
computer readable program code for associating a third set of information
with a third locale designation; and
computer readable program code for displaying said third set of
information associated with said third locale designation.

32. (Original) The computer program product of claim 31, further comprising:
computer readable program code for sorting said third set of information
in accordance with properties of said third locale designation; and
computer readable program code for searching said first and second sets
of information.

EVIDENCE APPENDIX

No additional evidence is presented.

RELATED PROCEEDINGS APPENDIX

No related proceedings are presented.